

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(RICHMOND)

IN RE:
MICHAEL JEROME FORD, *DBA* FORD
PROPERTY SERVICE LLC
Debtor

Case No.15-30854-KRH
(Chapter 13)

OBJECTION TO CONFIRMATION

COMES NOW Christiana Trust, A Division of Wilmington Savings Fund Society, FSB, as Trustee for Stanwich Mortgage Loan Trust, Series 2012-19 (“Christiana Trust”) by its undersigned counsel and hereby objects to the confirmation of the Chapter 13 plan filed by the debtors Michael Jerome Ford, dba Ford Property Service LLC (“Debtors”), and as grounds therefore states as follows:

1. Christiana Trust holds a first mortgage secured only by the Debtor’s primary residence known as 3708 Grovewood Road, Richmond, VA 23234 ("Property").
2. Christiana Trust will file its Proof of Claim by the Bar date of August 19, 2015 for the arrearage amount of \$3,407.04.
3. The Debtor’s plan violates 11 U.S.C. 1322(b)(2) by failing to pay the Christiana Trust, A Division of Wilmington Savings Fund Society, FSB, as Trustee for Stanwich Mortgage Loan Trust, Series 2012-19 claim in full and only list arrearage in the amount of \$1,100.00.

WHEREFORE, the premises considered, Christiana Trust respectfully requests the Court enter an Order denying the confirmation of the Debtors’ Chapter 13 Plan or in the alternative, increase funding to provide for payment in full of Christiana Trust and grant such other and relief

as this Court deems appropriate.

Respectfully submitted,

/s/ Kathryn E. Smits
Kathryn E. Smits, Bar #77337
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Attorneys for Christiana Trust, A
Division of Wilmington Savings Fund
Society, FSB, as Trustee for Stanwich
Mortgage Loan Trust, Series 2012-19

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NOTICE OF OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN
AND NOTICE OF HEARING

Christiana Trust, A Division of Wilmington Savings Fund Society, FSB, as Trustee for Stanwich Mortgage Loan Trust, Series 2012-19 has filed an objection to your Chapter 13 plan in this bankruptcy case.

Confirmation of your Chapter 13 plan may be denied. You should read these papers carefully and discuss them with your attorney, if you have one.

If you do not want the Court to deny confirmation of your plan, then you and your attorney must:

ATTEND THE HEARING TO BE HELD:

at: United States Bankruptcy Court – Judge Huennekens’ Courtroom, 701 East Broad Street, Room 5000, Richmond, Virginia

on: May 13, 2015 at 11:10 A.M.

to consider and act upon Objection to Confirmation filed by Christiana Trust, A Division of Wilmington Savings Fund Society, FSB, as Trustee for Stanwich Mortgage Loan Trust, Series 2012-19

If you or your attorney do not take these steps, the Court may decide that you do not oppose the objection to confirmation.

Respectfully submitted,

/s/ Kathryn E. Smits

Kathryn E. Smits, Bar #77337

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Attorneys for Christiana Trust, A Division
of Wilmington Savings Fund Society, FSB,
as Trustee for Stanwich Mortgage Loan
Trust, Series 2012-19

CERTIFICATION OF SERVICE

I HEREBY CERTIFY that copies of the foregoing Notice of Objection to Confirmation and Notice of Hearing and Objection to Confirmation were mailed by first class mail, postage-paid, and served electronically, where applicable, this 6th day of April, 2015 to the following parties:

Michael Jerome Ford
3708 Grovewood Road
Richmond, VA 23234
Debtor

Via first class mail

Laura Taylor Alridge
Amanda Erin DeBerry
Christina P. Spratley
Boleman Law Firm, P.C.

PO Box 11588
Richmond, VA 23230-1588
Attorney for the Debtor
Via first class mail and electronic

Suzanne E. Wade, Trustee
PO Box 1780
Richmond, VA 23218-1780
Via first class mail and electronic

/s/ Kathryn E. Smits
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Trust, Series 2012-19